IN THE

Supreme Court of the United States

No. 549. October Term, 1934.

WILLIAM D. GORDON, Secretary of Banking, and ROBERT G. FUNKHOUSER, Special Deputy as Agent in Possession of Chester County Trust Company,
Petitioner,

v.

LAURA A. WASHINGTON, Complainant, and EDWARD W. WELLS and RICHARD F. ENNIS, Receivers of Trust Fund Mortgages Aggregating $2,901,236.01,
Respondents.

I. THE FACTS.

The court is respectfully referred to the Brief contra petition for certiorari in William D. Gordon, Secretary of Banking, and Robert G. Funkhouser, Special Deputy as Agent in Possession of Chester County Trust Company, Petitioners v. Mary A. O'Brien, Complainant and John Hemphill and J. Louis Breitinger, Receivers of Trust Fund Mortgages, aggregating $1,742,404.91, Respondents.

The complainant in the instant case is Laura A. Washington, a citizen of Connecticut, and the holder of a participating certificate for $40,000.00 in the trust fund mortgages, aggregating $2,901,236.01.

II. COUNTER STATEMENT OF QUESTIONS INVOLVED.

The court is respectfully referred to the Brief contra petition for certiorari in William D. Gordon, Secretary of Banking, and Robert G. Funkhouser, Special Deputy as Agent in Possession of Chester County Trust Company, Petitioners v. Mary A. O'Brien, Complainant and John Hemphill and and J. Louis Breitinger, Receivers of Trust Fund Mortgages, aggregating $1,742,404.91, Respondents. Therein the issues as presented in Petitioner's Brief is re-stated.

III. ARGUMENT.

The court is respectfully referred to the Brief contra petition for certiorari in William D. Gordon, Secretary of Banking, and Robert G. Funkhouser, Special Deputy as Agent in Possession of Chester County Trust Company, Petitioners v. Mary A. O'Brien, Complainant and John Hemphill and J. Louis Breitinger, Receivers of Trust Fund Mortgages, aggregating $1,742,404.91, Respondents.

The facts of the two cases are substantially alike (R. 4). The differences being these:—Here complainant is a citizen of the State of Connecticut and the amount of the mortgage pool is $2,901,236.01. Both the District Court and the Circuit Court of Appeals wrote one opinion covering both cases.

Respectfully submitted,

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